

United States District Court  
Eastern District of Michigan  
Southern Division

UNITED STATES OF AMERICA,  
  
Plaintiff,

Hon. Mark A. Goldsmith

Case No. 23-cr-20062

v.

D-2 JALAL JAMIL a/k/a  
"JOHNNY,"  
D-4 DELAINE JACKSON,  
D-5 IBRAHIM SAMMOUR, and  
D-6 MARY SMELTER-BOLTON,

Defendants.

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**VOIR DIRE QUESTIONS OF  
DEFENSE COUNSEL**

The Defendant in this case is an African American woman who owns a business. Do any of you believe that a woman should not own their own business?

Do any of you have a problem with fairly and objectively listening to an African-American Business Woman to determine her truthfulness?

Respectfully submitted,

/s/ Elliott S. Hall

Elliott S. Hall (P14546)

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*Counsel for Mary Smelter-Bolton*

Dated: November 12, 2024

**CERTIFICATE OF SERVICE**

I hereby certify that on November 12, 2024, I electronically served a copy of the foregoing Defendant Smelter-Bolton's Voir Dire Questions of Defense Counsel on all counsel in this matter registered with the electronic filing system.

Respectfully Submitted,

/s/ Elliott S. Hall

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